

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-CV-897

IN RE:)
)
CAMP LEJEUNE WATER LITIGATION)
)
This Document Relates to:)
ALL CASES)
_____)

PLAINTIFFS' SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiffs respectfully serve this Seventh Request for Production of Documents as permitted under Federal Rules of Civil Procedure 26 and 34 as well as Case Management Order No. 2 in the above-captioned matter. These requests are being served by Plaintiffs, through Lead and Co-Lead Counsel, on Defendant United States of America ("Defendant"). Defendant is requested to respond to this Request within fourteen (14) days¹ of email delivery service. Unless otherwise stated, Plaintiffs incorporate the Instructions and Definitions in Plaintiffs' First Request for Production of Documents².

¹ This period has been limited, since the purpose of this discovery request is to resolve a continuing disagreement about obligations of the Defendant to prior discovery requests, as well as to clarify those requests and recent meet and confers concerning the targeted individuals for which the Plaintiffs seek documents and files that should have already been searched, retrieved and produced.

² For purpose of this request the term "ESI" is modified from the definitions incorporated herein by reference, to make clear here that Plaintiffs' request is not intended to require a "search" using traditional ESI search terms to locate responsive files and documents. To the extent the Defendant insists on taking the position that use of this term somehow invokes the "ESI" order, Plaintiffs have advised the Defendant that we consent to making clear this request can be exempt from such order which allows the parties per paragraph 6 to modify such requirements by agreement. As the result of the Defendant's failure and refusal to interview all highly relevant government employees who possess relevant documents and files concerning their work on Camp Lejeune Water Contamination issues, and multiple depositions where employees advise their documents never sought or produced, this request is being served to require compliance with the Defendant's obligations under Rules 26 and 34. Therefore, the purpose of this specific request to obtain these employees files and documents, including emails saved as .pdf and other file formats in their working files. Again, this is not a request to do some elaborate search of custodian data, but rather, talk to these people and get their documents and files as requested herein.

REQUESTS FOR PRODUCTION

1. After interviewing the below government employees, please identify and produce all relevant documents (including hard copies), emails, native files, power-points, research materials, spreadsheets, maps, diagrams, working drafts, memorandums, communications, notes and any other file materials contained on any computer storage device these employees saved their working materials or these files, regardless if an office computer or personal laptop/home computer, related to Camp Lejeune Water Contamination issues:

Patricia Hasting
Frank Bove
Christopher Rey
Ron Burke
Dan Waddill
Scott Williams
Chris Rennix
Tim Reisch
Jason Sautner
René Suárez-Soto

RESPONSE:

(SIGNATURES ON NEXT PAGE)

Respectfully submitted this 18th day of June, 2024.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)
Bell Legal Group, LLC
219 Ridge St.
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@belllegallgroup.com

Lead Counsel for Plaintiffs

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*)
Lieff Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
ecabraser@lchb.com

Co-Lead Counsel for Plaintiffs

/s/ Robin L. Greenwald

Robin L. Greenwald (admitted *pro hac vice*)
Weitz & Luxenberg, P.C.
700 Broadway
New York, NY 10003
Telephone: 212-558-5802
rgreenwald@weitzlux.com

Co-Lead Counsel for Plaintiffs

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)
Wallace & Graham, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Tel: 704-633-5244
mwallace@wallacegraham.com

Co-Lead Counsel for Plaintiffs

/s/ Zina Bash

Zina Bash (admitted *pro hac vice*)
Keller Postman LLC
111 Congress Avenue, Suite 500
Austin, TX 78701
Telephone: 956-345-9462
zina.bash@kellerpostman.com

*Co-Lead Counsel for Plaintiffs and
Government Liaison Counsel*

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)
The Dowling Firm PLLC
Post Office Box 27843
Raleigh, North Carolina 27611
Telephone: (919) 529-3351
mike@dowlingfirm.com

Co-Lead Counsel for Plaintiffs

/s/ James A. Roberts, III

James A. Roberts, III (N.C. Bar No.:
10495)
Lewis & Roberts, PLLC
3700 Glenwood Avenue, Suite 410
P. O. Box 17529
Raleigh, NC 27619-7529
Telephone: (919) 981-0191
jar@lewis-roberts.com

Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon counsel for Defendant on the 18th day of June 2024, by electronic mail at the following electronic mail address:
adam.bain@usdoj.gov.

/s/ J. Edward Bell, III
J. Edward Bell, III
Lead Counsel for Plaintiffs